

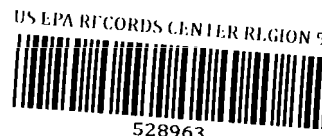


ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, ACTING DIRECTOR



September 9, 2016

Mr. Daniel Grapski
ExxonMobil Environmental Services Company
Project Coordinator
25915 S. Frontage Rd.
SH&E Building/Room 237
Channahon, IL 60410

Mr. Wilmer Reyes
CBS Operations
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222

Re: 0110300003 – Bureau County
New Jersey Zinc/Mobil Chemical
Superfund/Technical Reports

Operable Unit 2 – Phosphogypsum Stack Area

Dear Mr. Grapski and Mr. Reyes:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the UFP-Quality Assurance and Project Plan, Borrow Area Sampling, (i.e., Uniform Federal Policy Quality Assurance Project Plan (UFP-QAPP)), Revision No. 1.0 dated and received July 22, 2016. The UFP-QAPP is a revision based on Illinois EPA comments of May 19, 2016. The revised UFP-QAPP was accompanied by specific responses to comments. The UFP-QAPP was submitted on behalf of the DePue Group by Amec Foster Wheeler.

The UFP-QAPP is improved from its initial submittal, but Illinois EPA has a few follow up comments, as detailed below. Since there are few follow up comments, only the outstanding issues are included. Other responses are deemed to be acceptable, except as otherwise noted below.

Conceptually, Illinois EPA can accept developing one master QAPP that includes addenda as needed for future efforts, but the QAPP needs to be clear about which criteria apply to which effort. Based on what Illinois EPA currently understands, this QAPP is acceptable for one specific OU2 task (pending resolution of the comments below). The response to Worksheet 10 seems to imply this as well, and other worksheets make reference to an addendum for OU4. This UFP-QAPP has an OU2 emphasis, which Illinois EPA believes is appropriate at this time. Therefore, remove citations to “backfill” from the QAPP, and remove OU4 from the worksheet headings. Illinois EPA expects to receive a separate QAPP for OU4.

In the event enough soil exists at this borrow source to address certain areas of OU4, additional sampling will be required. Illinois EPA will expect a separate QAPP for the OU4 work. This OU2 QAPP may be used as an initial template, but appropriate changes for OU4 will be

required. As in Illinois EPA's last correspondence, in those instances where OU4 is mentioned in the follow up comments below, it is as guidance for developing the comprehensive updated QAPP already requested (and presumably already under preparation) for the OU4 work. Illinois EPA understands that other sources of cover soil may be evaluated for use at OU2; and if this is the case, then further modification will possibly be needed for certain worksheets (i.e., Worksheet 20).

Comment/Response 6, Worksheet #6, regarding field corrective actions: Illinois EPA had requested to know how corrective actions would be documented and stated that Illinois EPA should be informed of and should approve field corrective actions. "Approval" implies consultation with Illinois EPA before the change is made. Illinois EPA clarifies its initial comment: Worksheet #6 indicates that field corrective actions will be discussed amongst representatives of the DePue Group, and subsequently the Illinois EPA will be informed of any field corrective action in the Daily Field Report. There needs to be a mechanism that allows Illinois EPA to be involved in the consultation and approval of any field corrective actions. Please provide for this. This same comment applies to QAPP changes in the field.

Worksheet #10: The DePue Group believes that on-going sampling is unnecessary and impracticable. Illinois EPA does not necessarily agree for a situation such as OU4, but given several OU2 factors (i.e., size and scale of the project, history of the borrow source, future use of the property), Illinois EPA can agree to forgo this sampling, though Illinois EPA retains the right to request additional sampling of the source as warranted, for example, if soil were available to use at OU4.

Also, the response indicates pH ranges from 6.5-6.64 and 8.75-9.0, but Illinois EPA interprets this to mean pH ranges from 6.5-6.64 to 8.75-9.0. Please confirm.

Comment/Response 11, Worksheet #11: Collection of soil samples and completion of sample analysis will be in accordance with IAC 35 Subtitle J Part 1100.605 and Part 1100.610, and analytical data compared to TACO Tier I residential remediation objectives. Both regulations include remediation objectives for aldicarb (pesticide) and endothall (herbicide). However neither of these chemicals could be found in the SOPs for any of the methods listed on this work sheet. Please confirm the analytical methods that will be used for these chemicals and revise all worksheets, as necessary if method changes or additions need to be made.

Based on the lab SOPs it appears that Atrazine, Simazine, and Carbazole analysis can only be performed at the TestAmerica Chicago lab. Please confirm this, and if true, place a note in the QAPP (possibly in Worksheet #30) to describe how this will be handled.

Comment/Response 12, Worksheet #12: In each of the matrix tables the Measurement Performance Criteria for MS/MSD, Surrogate Spike, and LCS samples is listed as "Laboratory-specified limits". It's recognized that lab limits vary on an annual basis and are different for various types of chemicals, however an average value or range of criteria values should be presented here, i.e. sourced from the laboratory LIMS, or an appropriate list of values from the LIMS should be attached (see <https://clu-in.org/conf/tio/osc3/QAPP-Worksheets.pdf> for an example). This would also apply to Worksheet #28.

Each of the tables contains the following performance criteria text for Field Blanks, Method Blanks, and Trip Blanks: No target analyte detections >QL/2, PAL/5, or 1/5 the lowest concentration detected in the associated samples, whichever is highest. What is the origin or source of this criteria statement? The PAL (Project Action Limits) values should be defined in the footnote, or a reference to Worksheet #15 included.

New Comment: Worksheet 16: Does this mean Amec Foster Wheeler will be doing data validation for OU4?

Comment/Response 27, Worksheet #36, regarding third party validation: As was done for the OU4 Pilot Study, Illinois EPA reiterates that third party validation should be used for any soil that will be used as backfill material at OU4 and other confirmatory results. EPA National Functional Guidelines for Superfund organic and inorganic methods data review (<https://www.epa.gov/clp/contract-laboratory-program-national-functional-guidelines-data-review>) should substantively be followed for validation procedures. While the response indicates that the Worksheet has been revised to address Illinois EPA's comment, the Worksheet still states in bold font, "Outside Data Validation will not be conducted." This is not acceptable; please revise and provide for independent third party validation as the original comment requested.

If you have any questions or need additional information, please contact me at 217-785-2891 or at CharleneFalco@illinois.gov.

Sincerely,



Charlene Falco
Project Manager
Federal Site Remediation Section



CAF:CAH CLS:p \\DePue New Jersey Zinc Mobil Chemical\OU2 Phosphogypsum Stack Area\Closure Plan\Borrow Source\Revised QAPP Review_09 2016 docx

cc. Kevin Phillips, E&E
Joe Abel, ExxonMobil Environmental Services Company (via e-mail)
Jennifer Elkins, USEPA Region 5
Elizabeth Wallace, Office of the Illinois Attorney General
Beth Whetsell, Illinois Department of Natural Resources
Steve Walker, Enercon (via e-mail)
Ryan Keeler, Ramboll Environ (via e-mail)



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Operable Unit 2 – Phosphogypsum Stack Area

Dear Mr. Grapski and Mr. Reyes:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the *DePue Group responses to Illinois Environmental Protection Agency (Illinois EPA) comments on the Final Design Report, Operable Unit 2, Closure of the DePue Phosphogypsum Stack System, The DePue Site, DePue, Illinois dated January 2016*, dated and received August 16, 2016. The responses were submitted by Amec Foster Wheeler on behalf of the DePue Group.

The responses are acceptable, or Illinois EPA's acceptance is contingent on receipt and review of the revised Design. This correspondence is provided to you for your records to track the resolution of our previous Design comments and to initiate more dialogue regarding the topsoil to be placed on the final soil cover. Illinois EPA's minor comments – which do not require a formal response from the DePue Group – are:

Comment #4: This comment asked about the encroachment of the Clearwater Pond Dam on the limits of the liner proposed to cover the Upper and Lower Swale Area. The response indicates the drawings will be revised. Illinois EPA reserves the right to review the revisions and provide further comment if warranted.

Comment #6: It's not clear that data from 6 inches to 12 inches is representative of a depth interval from zero to 12 inches. But, the response does not provide any definitive course of action or approach; it only implies that 0-12 inches will be used for topsoil if the DePue Group chooses to do so. How and when will this decision be made? What is the logic that data from 6-

12 inches represents 0-12 inches, when the 0-6 inch depth interval was purposely excluded during the sampling to establish the borrow source's suitability?

Illinois EPA will be scheduling a conference call or meeting within the next few weeks to reach resolution on outstanding issues associated with the Closure Plan. Follow up discussion on the borrow source area can occur at that time.

If you have any questions or need additional information, please contact me at 217-785-2891 or at Charlene.Falco@illinois.gov.

Sincerely,



Charlene Falco
Project Manager
Federal Site Remediation Section

~~Y/CAK~~
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cc: Kevin Phillips, E&E
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Jennifer Elkins, USEPA Region 5
Elizabeth Wallace, Office of the Illinois Attorney General
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